UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

STATE OF TEXAS, et al.	§	
Plaintiffs,	§	
V.	§	0 1 1
	§	CIVIL ACTION No. 2:24-CV-00089-Z
BUREAU OF ALCOHOL, TOBACCO,	§	
FIREARMS AND EXPLOSIVES, et al.,	§	
Defendants.	§	

PLAINTIFFS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT FOR THEIR MOTION FOR TEMPORARY RESTRAINING AND/OR PRELIMINARY INJUNCTION

Plaintiffs respectfully request permission for their Motion for Preliminary Injunction and/or Temporary Restraining Order to exceed the page limit by <u>22</u> pages, making the combined filing <u>47</u> pages. Plaintiffs' motion raises complex issues in a case of national importance, and Plaintiffs require these extra pages to adequately present these issues to the Court. They seek this enlargement for good cause and in the interest of justice. Defendants have not indicated whether or not they oppose this motion.

Date: May 2, 2024

Respectfully submitted.

KEN PAXTON
Attorney General

Special Counsel

BRENT WEBSTER

Texas Bar No. 24096217

First Assistant Attorney General

KATHLEEN T. HUNKER

RALPH MOLINA

Special Counsel

Deputy Attorney General for Legal Strategy

Texas Bar No. 24118415

RYAN D. WALTERS

Chief, Special Litigation Division

OFFICE OF THE ATTORNEY GENERAL OF TEXAS

Special Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 Tel.: (512) 463-2100

garrett.greene@oag.texas.gov kathleen.hunker@oag.texas.gov

COUNSEL FOR PLAINTIFF STATE OF TEXAS

LYNN FITCH

Attorney General of Mississippi

ELIZABETH B. MURRILL

Attorney General

/s/Justin L. Matheny

JUSTIN L. MATHENY (MS Bar 100754)

Deputy Solictor General

OFFICE OF THE ATTORNEY GENERAL

P.O Box 220

Jackson, MS 39205-0220 Tel: (601) 359-3680 Fax: (601) 359-2003

justin.matheny@ago.ms.gov

/s/J. Benjamin Aguiñaga J. BENJAMIN AGUIÑAGA*

Solicitor General

LOUISIANA DEPARTMENT OF JUSTICE

1885 N. Third Street

Baton Rouge, Louisiana 70802

Tel: (225) 506-3746

aguinagab@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF

MISSISSIPPI

COUNSEL FOR PLAINTIFF THE STATE OF

LOUISIANA

*Admission To NDTX Pending

SEAN D. REYES

Utah Attorney General

/S/ Andrew Dymek

ANDREW DYMEK*

Assistant Solicitor General

UTAH OFFICE OF THE ATTORNEY

GENERAL

350 North State Street, #230

P.O. Box 142320

Salt Lake City, Ut 84114-2320

Tel.: 801-366-0533 adymek@agutah.gov

COUNSEL FOR PLAINTIFF STATE OF

UTAH

*Admission To NDTX Pending

/s/ Stephen D. Stamboulieh

STEPHEN D. STAMBOULIEH

STAMBOULIEH LAW, PLLC

NDTX#: 102784MS MS Bar No. 102784

P.O. Box 428

Olive Branch, MS 38654

(601) 852-3440 stephen@sdslaw.us

COUNSEL FOR JEFFERY W. TORMEY, GUN OWNERS OF AMERICA, GUN OWNERS FOUNDATION, TENNESSEE FIREARMS

ASSOCIATION, AND VIRGINIA CITIZENS

DEFENSE LEAGUE

/s/ John I. Harris III*

JOHN I. HARRIS III (TN # 12099)

SCHULMAN, LEROY & BENNETT PC

3310 West End Avenue, Suite 460 Nashville, Tennessee 37203 (615) 244 6670 Ext. 111 Fax (615) 254-5407

jharris@slblawfirm.com

COUNSEL FOR JEFFERY W. TORMEY, GUN OWNERS OF AMERICA, GUN OWNERS FOUNDATION, TENNESSEE FIREARMS ASSOCIATION, AND VIRGINIA CITIZENS **DEFENSE LEAGUE**

*Admission to NDTX pending

/s/ Brandon W. Barnett

BRANDON W. BARNETT

Texas Bar No. 24053088

BARNETT HOWARD & WILLIAMS PLLC

930 W. 1st St., Suite 202 Fort Worth, Texas 76102

817-993-9249 (T) 817-697-4388 (F)

barnett@bhwlawfirm.com

LOCAL COUNSEL, COUNSEL FOR JEFFERY W. TORMEY, GUN OWNERS OF AMERICA, GUN OWNERS FOUNDATION, TENNESSEE FIREARMS ASSOCIATION, AND VIRGINIA CITIZENS **DEFENSE LEAGUE**

Certificate of Conference

Opposing counsel has not yet entered an appearance in this matter. Thus, they are not able to indicate if they are opposed or unopposed to the motion.

/s/ Garrett Greene
Garrett Greene

Certificate of Service

On May 2, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record. Opposing counsel has not yet entered an appearance in this matter. When they do, they will have access to the documents filed and served through the Court's CM/ECF system.

/s/ Garrett Greene Garrett Greene